Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE
13901 Crown Court, Woodbridge, Virginia 22193
(703)583-3800 FAX (703) 583-3821
www.deq.virginia.gov

Matthew J. Strickler
Secretary of Natural Resources

David K. Paylor
Director
(804) 698-4000

Thomas A. Faha
Regional Director

August 20, 2019

Mr. William Shutrump
Terminal Supervisor, Sunoco Logistics
Sunoco Partners Marketing and Terminal, L.P.
Manassas Terminal
10315 Balls Ford Road
Manassas, Virginia 20109

Location: Manassas, Virginia
Registration No.: 70235

Dear Mr. Shutrump:

Attached is a renewal Title V Permit to operate your facility pursuant to 9VAC5 Chapter 80 Article 1 of the Virginia Regulations for the Control and Abatement of Air Pollution. The attached permit will be in effect beginning August 20, 2019.

In the course of evaluating the application and arriving at a final decision to issue this permit, the Department of Environmental Quality (DEQ) deemed the application complete on April 17, 2015 and solicited written public comments by placing a newspaper advertisement in the Washington Times on April 25, 2019. The thirty-day required comment period, provided for in 9VAC5-80-270 expired on May 28, 2019. The forty-five day comment period for the Environmental Protection Agency (EPA) expired on June 10, 2019.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and civil penalty. Please read all conditions carefully.

This permit approval to operate shall not relieve Sunoco Partners Marketing and Terminal, L.P. Manassas Terminal of the responsibility to comply with all other local, state, and federal permit regulations.

The Board's Regulations as contained in Title 9 of the Virginia Administrative Code 5-170-200 provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this case decision notice was mailed or delivered to you. Please consult the relevant regulations for additional requirements for such requests.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal to court by filing a Notice of Appeal with:

Mr. David K. Paylor, Director
Department of Environmental Quality
P. O. Box 1105
Richmond, VA 23218

If this permit was delivered to you by mail, three days are added to the thirty-day period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

If you have any questions concerning this permit, please contact Gary Beeson at the (703) 583-3969.

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Sincerely,

Justin A. Wilkinson
Regional Air Permit Manager

TAF/JAW/HGB/TV-70235-8/20/2019

Attachments: Permit
Attachment A - Source Testing Report Format
Attachment B - GD GACT Notification of Compliance Status

cc: Mr. Riley Burger, Office of Permits ad Air Toxics, EPA, Region III (electronic file submission)
Ms. Marguerite Porrini, Sunoco Partners Marketing and Terminal, L.P. (electronic file submission)
Ms. Susan Tripp, DEQ-OAPP (electronic file submission)
Manager/Inspector, Air Compliance (electronic file submission)

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Federal Operating Permit
Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1, of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9VAC5-80-50 through 9VAC5-80-300, of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	Sunoco Partners Marketing and Terminal, L.P.
Facility Name:	Manassas Terminal
Facility Location:	10315 Balls Ford Road, Manassas, Virginia 20109
Registration Number:	70235
Permit Number:	NRO-70235

This permit includes the following programs:

Federally Enforceable Requirements - Clean Air Act

August 20, 2019
Effective Date

August 20, 2024
Expiration Date

Thomas A. Faha

Regional Director
Thomas A. Faha

August 16, 2019

Signature Date

Contents

Facility Information

Permittee
Sunoco Partners Marketing and Terminal, LP
3801 West Chester Pike
Newtown Square, PA 19103

Responsible Official
Mr. William Shutrump
Terminal Supervisor

Facility
Sunoco Partners Marketing and Terminal, L.P. -- Manassas Terminal
10315 Balls Ford Road
Manassas, Virginia 20109

Contact Person
Ms. Marguerite Porrini
Environmental Specialist, HE &S
(610) 368-0307

County-Plant Identification Number: 153-00060

Facility Description: NAICS 424710 - The facility consists of nine (9) petroleum product storage tanks and six (6) additive tanks. Each of the nine petroleum storage tanks is equipped with internal floating roofs (IFR) with primary seals for VOC control. The gasoline is received at the facility from a major transcontinental pipeline and the additives are received by tanker trucks. The additives are mixed with the liquid petroleum products as it is delivered into trucks using the facilities loading rack for distribution. Most of the products are gasoline; however, some are diesel fuel. The main additive for the gasoline is denatured ethanol, which is stored in one of the large AST tank(s) equipped with internal floating roof. The other additives are stored in horizontal tanks ranging from 1,000 to 12,000 gallons.

Vapors associated with filling the trucks at the loading rack are captured and directed to a carbon-bed vapor recovery unit (VRU) or directed to a vapor combustion unit (VCU) for thermal oxidization.

Emission Units

Process Equipment to be operated consists of

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
T-1	N/A	Petroleum liquid storage tank. (1965) (Gasoline/Diesel/ Ethanol/Gasoline Blend)	1,099,644	Internal floating roof with primary seals	N/A	VOC	mNSR Permit August 7, 2012
T-2	N/A	Petroleum liquid storage tank. (1964) (Gasoline/Diesel/ Ethanol/Gasoline Blend)	1,995,798	Internal floating roof with primary seals	N/A	VOC	mNSR Permit August 7, 2012
T-3	N/A	Petroleum liquid storage tank. (1964) (Gasoline/Diesel/ Ethanol/Gasoline Blend)	618,576	Internal floating roof with primary seals	N/A	VOC	mNSR Permit August 7, 2012
T-4	N/A	Petroleum liquid storage tank. (1964) (Gasoline/Diesel/ Ethanol/Gasoline Blend)	1,800,158	Internal floating roof with primary seals	N/A	VOC	mNSR Permit August 7, 2012
T-5	N/A	Petroleum liquid storage tank. (1971) (Gasoline/Diesel/ Ethanol/Gasoline Blend)	738,402	Internal floating roof with primary seals	N/A	VOC	mNSR Permit August 7, 2012
T-6	N/A	Petroleum liquid storage tank. (1996) (Gasoline/Diesel/ Ethanol/Gasoline Blend)	2,016,000	Internal floating roof with primary seals	N/A	VOC	mNSR Permit August 7, 2012
T-7	N/A	Petroleum liquid storage tank. (1996) (Gasoline/Diesel/ Ethanol/Gasoline Blend)	2,016,000	Internal floating roof with primary seals	N/A	VOC	mNSR Permit August 7, 2012
T-21	N/A	Petroleum liquid storage tank. (2010) (Gasoline/Diesel/ Ethanol/Gasoline Blend)	2,293,097	Internal floating roof with primary seals	N/A	VOC	mNSR Permit August 7, 2012
T-22	N/A	Petroleum liquid storage tank. (2010) (Gasoline/Diesel/ Ethanol/Gasoline Blend)	2,323,750	Internal floating roof with primary seals	N/A	VOC	mNSR Permit August 7, 2012
LR	LR	Petroleum Product Loading Rack (1998)	144,000 gal/hr	VRU/VCU	N/A	VOC	mNSR Permit August 7, 2012
A-1	N/A	Petroleum Additive Storage	8,000 gallons	N/A	N/A	VOC	mNSR Permit August 7, 2012
A-2	N/A	Petroleum Additive Storage	8,000 gallons	N/A	N/A	VOC	mNSR Permit August 7, 2012
A-3	N/A	Petroleum Additive Storage	8,000 gallons	N/A	N/A	VOC	mNSR Permit August 7, 2012
A-4	N/A	Petroleum Additive Storage	8,000 gallons	N/A	N/A	VOC	mNSR Permit August 7,2012

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
T-1	N/A	Petroleum liquid storage tank. (1965) (Gasoline/Diesel/ Ethanol/Gasoline Blend)	1,099,644	Internal floating roof with primary seals	N/A	VOC	mNSR Permit August 7, 2012
T-2	N/A	Petroleum liquid storage tank. (1964) (Gasoline/Diesel/ Ethanol/Gasoline Blend)	1,995,798	Internal floating roof with primary seals	N/A	VOC	mNSR Permit August 7, 2012
T-3	N/A	Petroleum liquid storage tank. (1964) (Gasoline/Diesel/ Ethanol/Gasoline Blend)	618,576	Internal floating roof with primary seals	N/A	VOC	mNSR Permit August 7, 2012
T-4	N/A	Petroleum liquid storage tank. (1964) (Gasoline/Diesel/ Ethanol/Gasoline Blend)	1,800,158	Internal floating roof with primary seals	N/A	VOC	mNSR Permit August 7, 2012
T-5	N/A	Petroleum liquid storage tank. (1971) (Gasoline/Diesel/ Ethanol/Gasoline Blend)	738,402	Internal floating roof with primary seals	N/A	VOC	mNSR Permit August 7, 2012
T-6	N/A	Petroleum liquid storage tank. (1996) (Gasoline/Diesel/ Ethanol/Gasoline Blend)	2,016,000	Internal floating roof with primary seals	N/A	VOC	mNSR Permit August 7, 2012
T-7	N/A	Petroleum liquid storage tank. (1996) (Gasoline/Diesel/ Ethanol/Gasoline Blend)	2,016,000	Internal floating roof with primary seals	N/A	VOC	mNSR Permit August 7, 2012
T-21	N/A	Petroleum liquid storage tank. (2010) (Gasoline/Diesel/ Ethanol/Gasoline Blend)	2,293,097	Internal floating roof with primary seals	N/A	VOC	mNSR Permit August 7, 2012
T-22	N/A	Petroleum liquid storage tank. (2010) (Gasoline/Diesel/ Ethanol/Gasoline Blend)	2,323,750	Internal floating roof with primary seals	N/A	VOC	mNSR Permit August 7, 2012
LR	LR	Petroleum Product Loading Rack (1998)	144,000 gal/hr	VRU/VCU	N/A	VOC	mNSR Permit August 7, 2012
A-1	N/A	Petroleum Additive Storage	8,000 gallons	N/A	N/A	VOC	mNSR Permit August 7, 2012
A-2	N/A	Petroleum Additive Storage	8,000 gallons	N/A	N/A	VOC	mNSR Permit August 7, 2012
A-3	N/A	Petroleum Additive Storage	8,000 gallons	N/A	N/A	VOC	mNSR Permit August 7, 2012
A-4	N/A	Petroleum Additive Storage	8,000 gallons	N/A	N/A	VOC	mNSR Permit August 7,2012
A-5	N/A	Petroleum Additive Storage	8,000 gallons	N/A	N/A	VOC	mNSR Permit August 7, 2012
A-6	N/A	Petroleum Additive Storage	8,000 gallons	N/A	N/A	VOC	mNSR Permit August 7, 2012
W-1	N/A	Process Water Storage	20,000 gallons	N/A	N/A	VOC	mNSR Permit August 7, 2012

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
W-2	N/A	Process Water Storage	20,000 gallons	N/A	N/A	VOC	mNSR Permit August 7, 2012

*The Size/Rated capacity and PCD efficiency is provided for informational purposes only, and is not an applicable requirement.

Process Equipment Requirements – (TANKS T-1 THROUGH T-7, T-21, T-22, A-1 THROUGH A-6, W-1, AND W-2)

Limitations

1. Process Equipment Requirements - Volatile organic compound (VOC) emissions from the petroleum products storage tanks (Ref. ID T-1 through T-7, T-21, and T-22) shall be controlled following the requirements of Table 1 of 40 CFR 63, Subpart BBBBBB, to include internal floating roofs with primary seals. The storage tanks shall be provided with adequate access for inspection.
(9VAC5-80-110, 9VAC5-40-5220 A, 40 CFR 63, Subpart BBBBBB-Table 1, and Condition 2 of the August 7, 2012 NSR Permit)

2. Process Equipment Requirements - Volatile organic compound (VOC) emissions from the petroleum products storage tanks (Ref. ID T-6, T-7, T-21 and T-22), shall be controlled following the requirements of 40 CFR 60, Subpart Kb, to include internal floating roofs with primary seals between the floating roofs and the tank walls. The storage tanks shall be provided with adequate access for inspection.
(9VAC5-80-110, 9VAC5-40-5220 A, 9VAC5-50-410, 40 CFR 60 Subpart Kb, and Condition 3 of the August 7, 2012 NSR Permit)

3. Process Equipment Requirements - The exterior above ground surfaces (exposed to sunlight) of each tank (Ref. ID T-1 through T-7, T-21, and T-22) should be painted white, light pastels, or light metallic and such exterior paint should be periodically maintained in good condition. Repainting may be performed during normal maintenance periods.
(9VAC5-80-110 and 9VAC5-40-5230)

4. Process Equipment Requirements - The throughput of petroleum additives to the six petroleum additives storage tanks Ref. ID A-1 through A-6) collectively shall not exceed 1,138,461 gallons per year, calculated monthly as the sum of each consecutive twelve-month period. Compliance for the consecutive twelve-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding eleven months.
(9VAC5-80-110, and Condition 7 of the August 7, 2012 NSR Permit)

5. Process Equipment Requirements - The throughput of process water to the two process water tanks (Ref. ID W-1 through W-2) shall not exceed 800,000 gallons per year, calculated monthly as the sum of each consecutive twelve-month period. Compliance for the consecutive twelve-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding eleven months.
(9VAC5-80-110, and Condition 8 of the August 7, 2012 NSR Permit)

6. Process Equipment Requirements - Emissions from the operation of the nine tanks storage (Ref. ID T-1 through T-7, T-21, and T-22) collectively, shall not exceed the limit specified below:

VOC 35.0 tons/yr

These emissions are derived from the estimated overall emission contribution from standing losses at the rated capacities and working losses at the operating limits, excluding those of distillate fuel. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits.
(9VAC5-80-110, 9VAC5-50-260, and Condition 11 of the August 7, 2012 NSR Permit)

7. Process Equipment Requirements - Emissions from the operation of the six petroleum additive tanks (Ref. ID A-1 through A-6) collectively, shall not exceed the limit specified below:

Volatile Organic Compounds 1.0 ton/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with this emission limit may be determined as stated in Condition 4.
(9VAC5-80-110, and Condition 12 of the August 7, 2012 NSR Permit)

8. Process Equipment Requirements - Emissions from the operation of the two process water tanks (Ref. ID W-1 and W-2) collectively, shall not exceed the limit specified below:

Volatile Organic Compounds 2.56 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with this emission limit may be determined as stated in Condition 5.
(9VAC5-80-110, and Condition 13 of the August 7, 2012 NSR Permit)

Monitoring

9. Process Equipment Requirements - Tanks Storing Gasoline – Each time tanks (Ref. ID T-1 through T-7, T-21, and T-22) are emptied and degassed, (taken out of service for maintenance, an emergency, or similar purpose), the permittee shall make visual inspections of the internal floating roofs, primary seals, secondary seals (if equipped), gaskets, slotted membranes and sleeve seals (if any), and the fittings prior to filling each tank with product. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or seal fabric, the gaskets no longer close off the liquid surface from the atmosphere, or the slotted membrane has more than 10% open area, the owner/operator shall repair the items as necessary so that none of the anomalies specified herein shall exist when the tank is refilled. In no case shall these inspections occur at an

interval greater than 10 years. The permittee shall notify the Regional Air Compliance Manager of the DEQ's NRO at the address given in Condition 42, in writing, at least thirty days prior to the filling of each storage tank for which an inspection is required to afford the opportunity to have an observer present.
(9VAC5-80-110, 9VAC5-40-5220, 40 CFR 63, Subpart BBBBBB, and Condition 16 of August 7, 2012 NSR Permit)

10. Process Equipment Requirements - Tanks storing Volatile Organic Liquid (VOL) – Visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) of the tanks storing VOC (Ref. ID T-6, T-7, T-21, and T-22) through manholes and roof hatches on the fixed roof, following the requirements of 40 CFR 60.113b(a)(4), at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Regional Air Compliance Manager of the DEQ's NRO, in writing at the address given in Condition 42. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
(9VAC5-80-110 40 9VAC5-40-5200, CFR 60, Subpart Kb, and Condition 17 of the August 7, 2012 NSR Permit)

11. Process Equipment Requirements - Each time tanks (Ref. ID T-6, T-7, T-21, and T-22) are emptied and degassed, (taken out of service for maintenance, an emergency, or similar purpose), the permittee shall make visual inspections of the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any). If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs 40 CFR 60.113b(a)(2) and 40 CFR 60.113b(a)(3)(ii) and at intervals no greater than 5 years in the case of vessels specified in paragraph (a)(3)(i) of this section.
(9VAC5-80-110, 9VAC5-40-5220, 40 CFR 60, Subpart Kb, and Condition 16 of August 7, 2012 NSR Permit)

12. Process Equipment Requirements - Each tank's (Ref. ID T-1 through T-7, T-21, and T-22) internal floating roof shall be inspected annually by visually inspecting the floating roof deck, deck fittings, and rim seals through openings in the fixed roof following the requirements of 40 CFR 63.1063. The inspection may be performed entirely from the top

side of the floating roof, as long as there is visual access to all deck components specified in paragraph above. Any of the conditions described in paragraphs a through e of this section constitutes inspection failure.

a. Stored liquid on the floating roof.

b. Holes or tears in the primary or secondary seal (if one is present).

c. Floating roof deck, deck fittings, or rim seals that are not functioning as designed (as specified in paragraph (a) of this section).

d. Failure to comply with the operational requirements of paragraph (b) of this section.

e. Gaps of more than 0.32 centimeters (1/8 inch) between any deck fitting gasket, seal, or wiper and any surface that it is intended to seal.

(9VAC5-80-110 40 9VAC5-40-5200, CFR 60, Subpart BBBBBB, and Condition 17 of the August 7, 2012 NSR Permit)

Recordkeeping

13. Process Equipment Requirements - The permittee shall maintain records for each tank (Ref. ID T-1 through T-7, T-21, and T-22) of emission data and operating parameters, as necessary, to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Regional Air Compliance Manager of the DEQ's NRO at the address referenced in Condition 42. These records shall include, but are not limited to the results of tank visual inspections conducted in accordance with Conditions 9, 10, 11, and 12.

    All records maintained in accordance with this condition shall be maintained on site and be available for inspection for a period of at least five years.
    (40 CFR 63, Subpart BBBBBB, 9VAC5-40-5310, 9VAC5-50-50, and Condition 18 of the August 7, NSR Permit)

14. Process Equipment Requirements - The total annual throughput of petroleum additives to the six petroleum additives storage tanks (Ref. ID A-1 through A-6), calculated monthly as the sum of each consecutive twelve-month period. Compliance with the consecutive twelve-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding eleven months.
    (9VAC5-80-110, and Condition 18 of the August 7, 2012 NSR Permit)

15. Process Equipment Requirements - The total annual throughput of process water to the two process water tanks (Ref. ID W-1 and W-2), calculated monthly as the sum of each consecutive twelve-month period. Compliance for the consecutive twelve-month period

shall be demonstrated monthly by adding the most recently completed calendar month to the individual monthly totals for the preceding eleven months.
(9VAC5-80-110, and Condition 18 of the August 7, 2012 NSR Permit)

Reporting

16. Process Equipment Requirements - Following the annual tank inspection of the tanks (Ref. ID T-1 through T-7, T-21 and T-22), the permittee shall provide a report to the Regional Air Compliance Manager of the DEQ's NRO at the address in Condition 42 if any of the defective conditions presented in Condition 9 exist. The report shall include the specific condition and corrective action(s) taken. For T-6, T-7, T-21, and T-22, tanks in gasoline service, the permittee shall submit a copy of the inspection record required in 40 CFR 63.1065 when an inspection failure occurs as a part of the semiannual compliance report required by 40 CFR 63.11095(a).
(9VAC5-80-110, 40 CFR 63, Subpart BBBBBB, and Condition 19 of the August 7, 2012 NSR Permit)

17. Process Equipment Requirements - Following the annual tank inspection of the tanks (Ref. ID T-6, T-7, T-21, and T-22), the permittee shall notify the Regional Air Compliance Manager of the DEQ's NRO at the address in Condition 42 within 30 days following the annual tank visual inspection, as required at 40 CFR 60.115(b)(a)(4). If any of the defective conditions presented in Condition 10 exist. The report shall include the specific condition and corrective action(s) taken.
(9VAC5-80-110, 40 CFR 60, Subpart Kb, and Condition 19 of the August 7, 2012 NSR Permit)

Process Equipment Requirements – Loading Rack (LR) and Tanker Trucks

Limitations

18. Process Equipment Requirements - Volatile organic compound (VOC) emissions from the loading rack (Ref. ID LR) shall be controlled by a vapor recovery unit (VRU) or a vapor combustion unit (VCU) that reduce emissions to no more than 10 mg/liter of gasoline passing through the loading rack. The VRU and VCU shall be provided with adequate access for inspection and either the VRU or the VCU shall be in operation anytime the loading rack is operating.
(9VAC5-80-110, 9VAC5-50-410, 40 CFR 60, Subpart XX, and Condition 4 of the August 7, 2012 NSR Permit)

19. Process Equipment Requirements - The combined annual throughput of gasoline, denatured ethanol, gasoline-denatured ethanol blends, butane, and gasoline/butane blends through the tank truck loading rack (Ref. ID LR) shall be limited to 506,300,000 gallons calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive twelve-month period shall be demonstrated monthly by adding the total for the most

recently completed calendar month to the individual monthly totals for the preceding eleven months.
(9VAC5-80-110 and Condition 6 of the August 7, 2012 NSR Permit)

20. Process Equipment Requirements - The throughput of petroleum products through the loading rack (Ref. ID LR) shall not exceed 130,500 gallons per hour. Compliance shall be demonstrated daily by dividing the throughput for the day by the number of hours that the loading rack was operated that calendar day.
(9VAC5-80-110 and Condition 9 of the August 7, 2012 NSR Permit)

21. Process Equipment Requirements - Emissions from the operation of the loading rack (Ref. ID LR) and the emissions control equipment through which the vapors captured at the loading rack pass shall not exceed the limits specified below:

Nitrogen Oxides (as NO2)	5.3 lbs/hr	10.2 tons/yr
Carbon Monoxide	13.1 lbs/hr	25.4 tons/yr
Volatile Organic Compounds	10.9 lbs/hr	25.6 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits of Condition 19 and 20 may be considered credible evidence of the exceedance of emission limits.

This permit recognizes that an additional 8 mg/l of fugitive VOC emissions, as reflected in EPA 450/2-78-051, are known to be emitted from a vapor tight cargo tank during loading operations, so a maximum of 16.9 tons/yr of VOC fugitive emissions (based on 8 mg/l and 506,300,000 gallons of gasoline throughput and negligible contribution from distillate fuel oil) may be emitted from trucks during the loading operation. This estimate of maximum VOC fugitive emissions is not an enforceable limit of this permit, and is only to be used for emission inventory calculations and fee determinations.
(9VAC5-80-110 and Conditions 14 of the August 7, 2012 NSR Permit)

22. Process Equipment Requirements - Tanker Truck Vapor Tightness – Loading of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks as follows:

    a. Tanker trucks shall be filled by a top-submerged or bottom-fill in conjunction with a vapor control system. The Regional Air Compliance Manager of the DEQ's NRO may authorize an equivalent system with prior approval.

    b. There should be no leaks in the tanker trucks pressure vacuum release valves and hatch covers, or tanker truck associated vapor return lines during loading or unloading operations.

c. The terminal owner or operator shall obtain the vapor tightness documentation, described below, for each gasoline tank truck that is to be loaded at the facility.

d. The terminal owner or operator shall require the tank identification number to be recorded as each gasoline tank truck is loaded. This may be done manually or electronically.

e. The terminal owner or operator shall crosscheck each tank identification number obtained during item (b) above to assure vapor tightness documentation within two weeks after the tank is loaded.

f. The terminal owner or operator shall notify the owner or operator of each non-vapor tight gasoline tank truck loaded at the facility within three weeks after the loading has occurred.

g. The terminal owner or operator shall take steps assuring that the non-vapor tight gasoline tank truck will not be reloaded at the facility until vapor tightness documentation for that tank is obtained.

NOTE: Electronic identification and verification of vapor tightness is an acceptable method. Further crosschecks and notifications are not required as listed in (c) and (d) above.

(9VAC5-80-1180, 9VAC5-80-110, and 40 CFR 60, Subpart XX)

23. Process Equipment Requirements - Tanker Truck Vapor Tightness

a. No owner or other person shall use or permit the use of any tank truck or account truck that is loaded or unloaded at gasoline bulk loading facilities unless such truck is designed, maintained, and certified to be vapor tight. In addition, there shall be no avoidable visible liquid leaks.

b. Vapor-laden tank trucks or account trucks exclusively serving gasoline bulk loading facilities may be refilled only at the loading rack when the VRU or VCU control device are in operation.

c. Tank truck and account truck hatches shall be closed at all times during loading and unloading operations (periods during which there is liquid flow into or out of the truck) at gasoline bulk loading facilities.

(9VAC5-80-110, 9VAC5-40-5220, and 40 CFR 60, Subpart XX)

24. Process Equipment Requirements - Tanker Truck Vapor Tightness

a. The terminal owner or operator shall obtain the vapor tightness documentation described below for each gasoline tank truck that is to be loaded at the facility. This identification shall be either obtained manually, by computer chip located in the tanker truck grounding strap or another electronic identification system.

b. The terminal owner or operator shall require the tank identification number to be recorded for each gasoline tank truck that is loaded.

c. The terminal owner or operator shall cross-check each tank identification number obtained during item (b) above to assure vapor tightness documentation within two weeks after the tank is loaded, unless either of the following conditions is maintained:

d. If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation, then the documentation cross-check shall be performed each quarter, or

e. If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation, then the documentation crosscheck shall be performed semiannually.

f. If either the quarterly or the semiannual crosscheck provided in paragraphs (c)(i) or (ii) above reveals that these conditions were not maintained, the source must return to biweekly monitoring until these conditions are again met.

g. The terminal owner or operator shall notify the owner or operator of each non-vapor-tight gasoline tank truck loaded at the affected facility within one (1) week of the documentation crosscheck.

h. Alternative procedures to those described in (a) through (d) may be used only with prior approval from DEQ and EPA.

(9VAC5-80-110, 40 CFR 60.502, and 40 CFR 60, Subpart XX)

Monitoring

25. Process Equipment Requirements - VRU Monitoring

a. The VRU shall be equipped with devices (CEMS) to continuously measure and record total organic compounds (TOC).

b. All TOC emissions through the VRU must be monitored by a flame ionization detector (FID), a photo-ionization detector (PID), or a Non-Dispersive Infrared Analyzer (NDIR), or other method as approved by the Regional Air Compliance Manager of the DEQ's NRO in accordance with 40 CFR 60 Appendix B, Performance Specification 8. The CEM sampling shall be located in the control device outlet duct or stack, and the frequency of sampling shall be hourly, sampling may be performed

manually, or it may be continuous on a chart or by data acquisition system. The sensor shall measure TOC, rather than individual organic compounds. This equipment shall be operated according to the manufacturer's instructions.

c. The monitoring device installed on the VRU shall be certified for accuracy annually (i.e. once every four successive calendar quarters) at a minimum following the procedures of 40 CFR 60, Appendix F.

d. The permittee shall submit a testing protocol for approval to the Region Air Compliance Manager of the DEQ's Northern Regional Office (NRO) at least 30 days prior to the proposed testing.

e. Within sixty days (60) following the completion of the annual test, a test report shall be submitted to the Air Compliance Manager of DEQ's NRO (one hard copy and one electronic copy).

f. The monitoring device shall be installed, maintained, calibrated, and operated in accordance with approved procedures, which shall include, as a minimum, the manufacturer's written requirements or recommendations, and the EPA Notification of Compliance for 40 CFR 63, Subpart BBBBBB (aka gasoline distribution generally available control technologies (GD GACT) document submitted to EPA as required (see Attachment). The monitoring device shall be provided with adequate access for inspection and shall be in operation when the VRU is operating.

g. Should the CEM be inoperative during tank truck loading the procedures of the GD GACT shall be followed.

NOTE: (EXERT from the GD GACT) – As included in the Reporting requirement – Note that in the event of CEM downtime during truck loading, if proper operation of the loading rack cannot be verified using the alternative method outlined in 40 CFR 63.11092(b)(1)(i)(B), a summary report may be submitted to the administrator, providing that:

-The total duration of excess emissions or parameter exceedances for the reporting period are less than 1 percent; and,

- The CEMS downtime is less than 5 percent (without alternative verification of proper operation).

If greater than 1 percent and 5 percent, both the summary and emissions/performance report shall be submitted.

(9VAC5-80-110, 40 CFR 60, Appendix F, and 40 CFR 63, Subpart BBBBBB)

26. Process Equipment Requirements - VCU Monitoring

a. The vapor combustion unit shall be equipped with a monitoring port to allow for visual inspection of the pilot flame while fuel is being transferred in the loading rack.

b. The VCU monitoring shall follow the alternative monitoring procedures outlined in the EPA Notification of Compliance for 40 CFR 63, Subpart BBBBBB (aka gasoline distribution generally available control technologies (GD GACT) document submitted to EPA (see Attachment).

c. The vapor combustion unit shall be equipped with a flame-sensing device, such as an ultraviolet beam sensor of a thermocouple, installed in proximity of the pilot light, to indicate the presence of a flame. The heat-sensing device shall send a positive parameter value to indicate that the pilot flame is on, or a negative parameter value to indicate that the pilot flame is off.

d. The vapor combustion unit shall be designed and equipped to automatically prevent gasoline loading operations from beginning any time that the pilot flame is absent.

e. The permittee shall inspect the flame-sensing device quarterly to ensure that the device is properly registering positive or negative signals corresponding to the presence or lack of presence of flame. The results of the inspection shall be recorded. In the event the flame-sensing device is discovered to be operating improperly, the permittee shall discontinue fuel transfer operations at the loading rack until the device is repaired or replaced. The permittee shall record the actions taken to correct the occurrence.

f. The permittee shall continuously monitor the temperature in the stack of the VCU to ensure proper operation. Temperature measurements shall be continuously recorded on a device that yields a minimum 24-hour period of operation. The permittee shall ensure that temperatures at the monitoring device remain between 200 °F and 1500 °F when displaced fuel vapors are being combusted in the VCU, taking into account the time that elapses before hot gases reach the elevated monitoring device. Temperatures within this range are considered to reflect good operation of the VCU. Temperatures outside of this range for periods greater than sixty consecutive minutes indicate excursions. The permittee shall initiate actions to correct the out of range condition as soon as practicable. The permittee shall record periods of out of range values, the temperatures that existed during the out of range period and actions taken to correct the out of range condition.

g. The permittee shall inspect the temperature monitoring system each facility-operating day, when the VCU is in operation, to ensure the system is properly measuring and registering temperatures of combustion gases in the VCU. The permittee shall repair or replace a malfunctioning temperature monitoring device as soon as practicable, and maintain a replacement on site to minimize the time the VCU operates without a temperature-monitoring device. The permittee shall maintain records of all repair and replacement activity, as well as operational periods where the temperature-monitoring device was not operational/installed.

h. The permittee shall inspect the burners of the VCU on a semiannual basis and maintain the burner according to manufacturer's written instructions for proper operation and maintenance. The permittee shall maintain records of all inspection and maintenance activity of the burner.

(9VAC5-80-110 and 40 CFR 63, Subpart BBBBBB)

27. Process Equipment Requirements - To ensure good performance, the monitoring devices for the VRU and VCU (whichever is in operation) shall be observed by the permittee with a frequency of not less than once per day during the operation of the control device to insure proper operation of the control device. The permittee shall keep a log of the monitoring device observations from the VRU or VCU, as applicable that day.
(9VAC5-80-110)

28. Process Equipment Requirements - Each calendar month, the vapor collection system, the vapor processing system, and the loading rack handling gasoline shall be inspected during the loading of gasoline tanker trucks for total organic compounds, liquid, or vapor leaks. The detection methods incorporating sight, sound, or smell will be acceptable. Should a leak be detected, the leak shall be recorded and the source of the leak repaired within fifteen (15) calendar days after it is detected. The record of these inspections shall include, as a minimum, the following:

a. Date of inspection.

b. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).

c. Leak determination method.

d. Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).

e. Inspector name and signature.

(40 CFR 60, Subpart XX, 40 CFR 63, and Subpart BBBBBB)

Recordkeeping

29. Process Equipment Requirements - Tanker Truck Vapor Tightness – Tanker truck vapor tightness documentation shall be kept on file on a remote electronic data system or at the facility, in a permanent form available for inspection. This documentation file for each gasoline tank truck shall be updated at least once per year to reflect the current test results as determined by Method 27 of 40 CFR 60 Appendix A and Subpart XX. This record shall include at a minimum the following information:

a. Test title: Gasoline Delivery Tank Pressure Test - EPA Reference Method 27.

b. Tank owner and address.

c. Tank identification number.

d. Testing location.

e. Date of test.

f. Tester name and signature.

g. Witnessing inspector, if any - Name, signature, and affiliation.

h. Test results - Actual pressure change in five (5) minutes, mm of water (average for two (2) runs).

(9VAC5-80-110, 40 CFR 60, Subpart XX, and 40 CFR 63, Subpart BBBBBB)

30. Process Equipment Requirements - Tanker Truck Certification – Vapor Tightness – For the purposes of the semiannual report required in General Condition 50, the permittee shall keep records of any tank trucks that were loaded which did not meet the requirements of Condition 29 above, and any follow-up that occurred.
(9VAC5¬-80-110)

31. Process Equipment Requirements - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Regional Air Compliance Manager of the DEQ's NRO. These records shall include, but are not limited to:

a. Total hours each calendar day of operation of the loading rack

b. The daily (calendar day) throughput of petroleum products through the loading rack.

c. The hourly throughput of petroleum products through the loading rack as determined daily by dividing the throughput for the day by the number of hours that the loading rack was operated that calendar day

d. Annual throughput of gasoline, denatured ethanol, and butane through the loading rack (LR), calculated monthly as the sum of each consecutive twelve-month period. Compliance for the consecutive twelve-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding eleven months

e. Monthly and annual emission calculations for CO, NOX, and VOC from the loading rack emissions control equipment using methods approved by the Regional Air

Compliance Manager of the DEQ's NRO to verify compliance with the ton/yr emissions limitations in Condition 21 of this permit, with annual emissions calculated as the sum of each consecutive twelve-month period.

f. Exceedance of the hourly throughput limits in Condition 20 shall be considered creditable evidence of exceeding the hourly emission limits in Condition 21.

g. A record of the daily, monthly, and quarterly observations of the proper operation of the VCU as required in Condition 26.

h. A record of the daily VRU/VCU operation review as required in Condition 27.

i. A record on the monthly vapor collection system inspections as required in Condition 28.

j. A record of all repair and replacement activity of the VCU temperature-monitoring device, as well as operational periods where the temperature-monitoring device was not operational/installed, as required in Condition 26.

k. A record of the semiannual inspections of the VCU burners and maintenance activity of the burner as required in Condition 26.

l. The tanker truck certifications as required in Condition 29.

m. Records of all replacements or additions to the vapor control system.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
(9VAC5-80-110 and Condition 18 of the August 7, 2012 NSR Permit)

Testing

32. Process Equipment Requirements - The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the DEQ, test ports shall be provided at the appropriate locations.
(9VAC5-80-110 and 9VAC5-40-30)

33. Process Equipment Requirements - VRU/VCU

a. At least every five (5) years or upon request by the DEQ, the permittee shall conduct performance tests for volatile organic compounds (VOC), carbon monoxide (CO), and nitrogen oxides (NOX) from the vapor combustion unit (VCU) and performance tests for volatile organic compounds (VOC) from the vapor recovery unit (VRU) to demonstrate compliance with the emission limits contained in Conditions 18 and 21 of this permit. Should an application shield be in place and the renewed permit has not

been issued, the five-year period will continue to proceed as if the permit had been renewed.

b. A written performance test protocol shall be submitted to the Regional Air Compliance Manager of the DEQ's NRO, at the address given in Condition 42 of this permit for approval at least thirty-days prior to the date scheduled to conduct the performance evaluation.

c. Tests shall be conducted and reported with the data reduced as set forth in 9VAC5-50-30.

d. Sixty days following the completion of the testing, the owner shall provide the Regional Air Compliance Manager of the DEQ's NRO, with one hard copy of the performance test report and one copy of the performance test report on electronic media to the address specified in Condition 42 of this permit. The report format shall follow the "Source Test Report Format" included with this permit.

(9VAC5-40-30, 9VAC5-80-110, and Condition 15 of the August 7, 2012 NSR Permit)

34. Process Equipment Requirements – VRU/VCU - The vapor control systems (VRU or VCU) shall be tested after a major shutdown. A major shutdown is defined as complete change-out of the carbon beds, burn-through of the carbon beds, failure of the refrigeration unit, or failure of the combustion unit. The following test methods and procedures shall be used -- 40 CFR 60, Appendix A, and 40 CFR 60, Subpart XX.

a. The permittee shall submit a test protocol to the Regional Air Compliance Manager of the DEQ's NRO at least thirty-days prior to testing at the address specified in Condition 42 of this permit.

b. One hard copy and one electronic copy of the test results shall be submitted to the Regional Air Compliance Manager of the DEQ's NRO, at the address specified in Condition 42 of this permit, within sixty-days after test completion.

(9VAC5-80-110 and 9VAC5-50-30)

Reporting

35. Process Equipment Requirements - Vapor Process System Monthly Inspection – Any leaks, detected as a result of the inspection required in Condition 28, which are unable to be repaired within fifteen (15) days, the owner or operator shall provide in the semiannual report specified in 40 CFR 63.11095(b), the reason(s) why the repair was not feasible and the date each repair was completed.
(9VAC5-80-110 and 40 CFR 63, Subpart BBBBBB)

36. Process Equipment Requirements – Performance Testing - The permittee shall submit to the Regional Air Compliance Manager of DEQ's NRO, one hard copy, and one copy on

electronic media, the results of the emission testing required in Conditions 33 and 34 within sixty-days following the completion of the testing.
(9VAC5-80-110. 9VAC5-40-50, and Condition 15 of the August 7, 2012 NSR Permit)

Facility Wide Conditions

Limitations

37. Process Equipment Requirements - The permittee shall comply with the applicable requirements of the General Provisions as outlined in Table 3 of Subpart BBBBBB for the bulk gasoline terminal facility.
(9VAC5-80-110 and 40 CFR 63, Subpart BBBBBB)

38. Process Equipment Requirements - Except where this permit is more restrictive, the equipment listed in the Emission Units Table shall be operated in compliance with the requirements of 40 CFR 63, Subpart BBBBBB (National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities), 40 CFR 60, Subpart XX (Standards of Performance for Bulk Gasoline Terminals), 40 CFR 60, and Subpart Kb (Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984) .
(9VAC5-80-110 and Condition 10 of the August 7, 2012 NSR Permit)

39. Process Equipment Requirements - At all times the disposal of VOCs shall be accomplished by taking measures, to the extent practicable, consistent with air pollution control practices for minimizing emissions. VOCs shall not be intentionally spilled, discarded in sewers that are not connected to a treatment plant, stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution practices for minimizing emissions.
(9VAC5-80-1180 and Condition 5 of the August 7, 2012 NSR Permit)

Testing

40. Process Equipment Requirements - If testing is conducted in addition to that specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.
(9VAC5-80-110)

41. Process Equipment Requirements - Samples taken as required by this permit shall be analyzed in accordance with 1 VAC 30-45, Certification for Noncommercial Environmental Laboratories, or 1 VAC 30-46, Accreditation for Commercial Environmental Laboratories as applicable.
(9VAC5-80-110)

Reporting

42. Process Equipment Requirements - All written correspondence concerning compliance with this permit should be submitted to the following address:

    Regional Air Compliance Manager
    Northern Regional Office
    Department of Environmental Quality
    13901 Crown Court
    Woodbridge, Virginia 22193

    (9VAC5-80-110 and Condition 15 of the August 7, 2012 NSR Permit)

43. Process Equipment Requirements - The permittee shall furnish notification to the Regional Air Compliance Manager of DEQ's NRO at the address referenced in Condition 42 of the intention to shut down or bypass, or both, air pollution control equipment for necessary scheduled maintenance, which results in excess emissions for more than one hour, at least twenty-four hours prior to the shutdown. The notification shall include, but is not limited to, the following information:

    a. Identification of the air pollution control equipment to be taken out of service, as well as its location, and registration number;

    b. The expected length of time that the air pollution control equipment will be out of service;

    c. The nature and quantity of emissions of air pollutants likely to occur during the shutdown period;

    d. Measures that will be taken to minimize the length of the shutdown or to negate the effect of the outage.

    (9VAC5-80-110 and Condition 26 of the August 7, 2012 NSR Permit)

Insignificant Emission Units

44. Insignificant Emission Units - The following emission units at the facility are identified in the application as insignificant emission units under 9VAC5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720B)	Rated Capacity (9VAC5-80-720C
T-8	Horizontal fixed-roof tank for storing petroleum products	9VAC5-40-5200 C	VOC	8,000 gallons
BT-1	Butane bullet tank	9VAC5-80-1105	VOC	60,000 gallons

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9VAC5-80-110. (9VAC5-80-110)

Permit Shield & Inapplicable Requirements

45. Process Equipment Requirements - Compliance with the provisions of this permit shall be deemed in compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
9VAC5-40-3410 through 3550	Emission Standards for VOC Storage and Transfer Operations	Since the provisions under petroleum liquids storage or transfer apply, and support tanks are less than 40,000 gallons capacity Article 25 does not apply (9VAC5-40-3410.C)
40 CFR 60, Subparts K and Ka Gasoline Storage Tanks	NSPS for storage vessels for petroleum liquids/volatile organic liquids	All gasoline storage tanks with exception of T-6, T-7, T-21, and T-22 were constructed prior to June 11, 1973 and therefore not subject to these subparts.
40 CFR 63, Subpart R	National Emission Standards for Gasoline Distribution – Stage I	The source is exempt from the requirements of Subpart R because potential HAP emissions are below 10 TPY for a single HAP and below 25 TPY for a combination of all HAPs.
40 CFR 68	Accidental Release Prevention Requirements: Section 112(r)	Petroleum Liquids (gasoline, diesel fuel, jet fuel, etc.) are not subject to this rule.

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by (i) the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.
(9VAC5-80-140)

General Conditions

46. General Conditions - Federal Enforceability - All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9VAC5-80-110)

47. General Conditions - Permit Expiration

    a. This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9VAC5-80-80, the right of the facility to operate shall be terminated upon permit expiration.
    b. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.

    c. If an applicant submits a timely and complete application for an initial permit or renewal under 9VAC5-80-80 F, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9VAC5 Chapter 80, until the Board takes final action on the application under 9VAC5-80-150.

    d. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9VAC5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9VAC5 Chapter 80.

    e. If an applicant submits a timely and complete application under section 9VAC5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9VAC5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.

    f. The protection under subsections F 1 and F 5 (ii) of section 9VAC5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9VAC5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

    (9VAC5-80-80, 9VAC5-80-110 and 9VAC5-80-170)

48. General Conditions -Recordkeeping and Reporting - All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

    a. The date, place as defined in the permit, and time of sampling or measurements;

    b. The date(s) analyses were performed;

    c. The company or entity that performed the analyses;

d. The analytical techniques or methods used;

e. The results of such analyses; and

f. The operating conditions existing at the time of sampling or measurement.
(9VAC5-80-110)

49. General Conditions – Recordkeeping and Reporting - Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
(9VAC5-80-110)

50. General Conditions - Recordkeeping and Reporting - The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than March 1 and September 1 of each calendar year. This report must be signed by a responsible official, consistent with 9VAC5-80-80 G, and shall include:

a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31; and

b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:

i. Exceedances of emissions limitations or operational restrictions;

ii. Excursions from control device operating parameter requirements, as documented by continuous emission monitoring or periodic monitoring, or Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or,

iii. Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semiannual reporting period."

(9VAC5-80-110)

51. General Conditions - Annual Compliance Certification - Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices for

the period ending December 31. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. The permittee shall maintain a copy of the certification for five (5) years after submittal of the certification. This certification shall be signed by a responsible official, consistent with 9VAC5-80-80 G, and shall include:

a. The time period included in the certification. The time period to be addressed is January 1 to December 31;

b. The identification of each term or condition of the permit that is the basis of the certification;

c. The compliance status;

d. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance;

e. Consistent with subsection 9VAC5-80-110, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period;

f. Such other facts as the permit may require to determine the compliance status of the source; and

g. One copy of the annual compliance certification shall be submitted to EPA in electronic format only. The certification document should be sent to the following electronic mailing address:

R3_APD_Permits@epa.gov

(9VAC5-80-110)

52. General Conditions - Permit Deviation Reporting - The permittee shall notify the Regional Air Compliance Manager of the DEQ's NRO within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. Owners subject to the requirements of 9VAC5-40-50 C and 9VAC5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9VAC5-40-40 and 9VAC5-50-40. The occurrence should also be reported in the next semiannual compliance monitoring report pursuant to Condition 50 of this permit.
(9VAC5-80-110 F. 2)

53. General Conditions - Failure/Malfunction Reporting - In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall no later than four daytime business hours after the malfunction is discovered, notify the Northern Regional Office such failure or malfunction and within 14 days provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9VAC5-40-50 C and 9VAC5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9VAC5-40-40 and 9VAC5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Northern Regional Office.
(9VAC5-80-110 and 9VAC5-20-180)

54. General Conditions - Failure/Malfunction Reporting - The emission units that have continuous monitors subject to 9VAC5-40-50 C and 9VAC5-50-50 C are not subject to the 14 day written notification.
(9VAC5-20-180 and 9VAC5-40-50)

55. General Conditions - Failure/Malfunction Reporting - Each owner required to install a continuous monitoring system (CMS) or monitoring device subject to 9VAC5-40-41 or 9VAC5-50-410 shall submit a written report of excess emissions (as defined in the applicable subpart in 9VAC5-50-410) and either a monitoring systems performance report or a summary report form, or both, to the board semiannually All semiannual reports shall be postmarked by the 30th day following the end of each calendar semiannual period (June 30th and January 30th). All reports shall include the following information:

    a. The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h) or 9VAC5-40-41 B.6, any conversion factors used, and the date and time of commencement and completion of each period of excess emissions;

    b. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the source. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted;

    c. The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments; and

    d. When no excess emissions have occurred or the continuous monitoring systems have not been inoperative, repaired or adjusted, such information shall be stated in the report.

    All malfunctions of emission units not subject to 9VAC5-40-50 C and 9VAC5-50-50 C require written reports within 14 days of the discovery of the malfunction.
    (9VAC5-80-110, 9VAC5-20-180 C, and 9VAC5-40-50)

56. General Conditions - Severability - The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9VAC5-80-110)

57. General Conditions - Duty to Comply - The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.
(9VAC5-80-110)

58. General Conditions - Need to Halt or Reduce Activity not a Defense - It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
(9VAC5-80-110)

59. General Conditions - Permit Modification - A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9VAC5-80-50, 9VAC5-80-1100, 9VAC5-80-1605, or 9VAC5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.
(9VAC5-80-110, 9VAC5-80-190, and 9VAC5-80-260)

60. General Conditions - Property Rights - The permit does not convey any property rights of any sort, or any exclusive privilege.
(9VAC5-80-110)

61. General Conditions - Duty to Submit Information - The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.
(9VAC5-80-110)

62. General Conditions - Duty to Submit Information - Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9VAC5-80-80 G.
(9VAC5-80-110)

63. General Conditions - Duty to Pay Permit Fees - The owner of any source for which a permit was issued under 9VAC5-80-50 through 9VAC5-80-300 shall pay annual emissions fees, as

applicable, consistent with the requirements of 9VAC5-80-310 through 9VAC5-80-350 and annual maintenance fees, as applicable, consistent with the requirements of 9VAC5-80-2310 through 9VAC5-80-2350.
(9VAC5-80-110, 9VAC5-80-310 et seq., and 9VAC5-80-2310 et seq.)

64. General Conditions - Fugitive Dust Emission Standards - During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

    a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;

    b. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;

    c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;

    d. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,

    e. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

    (9VAC5-80-110 and 9VAC5-40-90)

65. General Conditions - Startup, Shutdown, and Malfunction - At all times, including periods of startup, shutdown, and soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
(9VAC5-80-110 and 9VAC5-40-20 E)

66. General Conditions - Alternative Operating Scenarios - Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which

it is operating. The permit shield described in 9VAC5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9VAC5 Chapter 80, Article 1.
(9VAC5-80-110)

67. General Conditions - Inspection and Entry Requirements - The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

    a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.

    b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.

    c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.

    d. Sample or monitor at reasonable times' substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

    (9VAC5-80-110)

68. General Conditions - Reopening for Cause - The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9VAC5-80-80 F. The conditions for reopening a permit are as follows:

    a. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

    b. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

    c. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9VAC5-80-110 D.

    (9VAC5-80-110)

69. General Conditions - Permit Availability - Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request. (9VAC5-80-110 and 9VAC5-80-150)
70. General Conditions - Transfer of Permits

    a. No person shall transfer a permit from one location to another, unless authorized under 9VAC5-80-130, or from one piece of equipment to another.

    b. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9VAC5-80-200.

    c. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9VAC5-80-200.

    (9VAC5-80-110 and 9VAC5-80-160)

71. General Conditions - Permit Revocation or Termination for Cause - A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9VAC5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations.
(9VAC5-80-110, 9VAC5-80-190 C, and 9VAC5-80-260)

72. General Conditions - Duty to Supplement or Correct Application - Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9VAC5-80-110 and 9VAC5-80-80 E)

73. General Conditions - Stratospheric Ozone Protection - If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(9VAC5-80-110 and 40 CFR Part 82)

74. General Conditions - Asbestos Requirements - The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150). (9VAC5-60-70 and 9VAC5-80-110)

75. General Conditions - Accidental Release Prevention - If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68. (9VAC5-80-110 and 40 CFR Part 68)

76. General Conditions - Changes to Permits for Emissions Trading - No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9VAC5-80-110)

77. General Conditions - Emissions Trading - Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

    a. All terms and conditions required under 9VAC5-80-110, except subsection N, shall be included to determine compliance.

    b. The permit shield described in 9VAC5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.

    c. The owner shall meet all applicable requirements including the requirements of 9VAC5-80-50 through 9VAC5-80-300.

    (9VAC5-80-110)

SOURCE TESTING REPORT FORMAT

Cover
1. Plant name and location
2. Units tested at source (indicate Ref. No. used by source in permit or registration)
3. Tester; name, address and report date

Certification
1. Signed by team leader / certified observer (include certification date)
* 2. Signed by reviewer

Introduction
1. Test purpose
2. Test location, type of process
3. Test dates
* 4. Pollutants tested
5. Test methods used
6. Observers' names (industry and agency)
7. Any other important background information

Summary of Results
1. Pollutant emission results / visible emissions summary
2. Input during test vs. rated capacity
3. Allowable emissions
* 4. Description of collected samples, to include audits when applicable
5. Discussion of errors, both real and apparent

Source Operation
1. Description of process and control devices
2. Process and control equipment flow diagram
3. Process and control equipment data

* Sampling and Analysis Procedures
1. Sampling port location and dimensioned cross section
2. Sampling point description
3. Sampling train description
4. Brief description of sampling procedures with discussion of deviations from standard methods
5. Brief description of analytical procedures with discussion of deviation from standard methods

Appendix
* 1. Process data and emission results example calculations
2. Raw field data
* 3. Laboratory reports
4. Raw production data
* 5. Calibration procedures and results
6. Project participants and titles
7. Related correspondence
8. Standard procedures

____* Not applicable to visible emission evaluations.

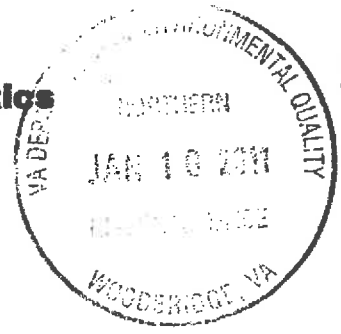
ATTACHMENT

GD GACT Notification of Compliance Status

Gasoline Distribution Generally Available Control Technologies

70235

Sunoco Logistics



Sunoco Partners Marketing & Terminals, L.P.
1818 Market St., Ste 1500
Philadelphia, PA 19103-3615

January 6, 2011

US EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Sunoco Partners Marketing & Terminals, L.P. – Manassas Terminal
Notification of Compliance Status
40 CFR part 63, subpart BBBBBB (also known as 'GD GACT)

Dear Sir or Madam:

This communication suffices the GD GACT Notification of Compliance Status for affected sources subject to the control requirements of 40 CFR part 63 subpart BBBBBB.

Owner/Operator:	Sunoco Partners Marketing & Terminals, L.P 1818 Market Street, Suite 1500 Philadelphia, PA 19103
Physical Location:	Manassas Terminal 10315 Ballsford Road Manassas, VA 20109
Relevant Standard:	40 CFR Part 63 subpart BBBBBB
Site Description:	Bulk Gasoline Terminal – containing loading rack, storage vessel(s) and "equipment" in gasoline service as defined by 63.11100

Please note that the attached GACT Compliance worksheet outlines methods used to comply with subpart BBBBBB. This compliance worksheet includes specific information intended to meet submittal requirements as well as status notifications.

Should you have any questions, please contact me at (610) 670-3297.

Sincerely,

Jed A. Werner
Environmental Specialist

Cc: Commonwealth of Virginia DEQ
Northern Regional Office
13901 Woodbridge, VA 22193-1453

Attachments: GDGACT Notification of Compliance Status

CRC KMF 1/11/11

GD GACT Notification of Compliance Status

Facility: Manassas Terminal

Promulgation Date: January 10, 2008

Rule Citation: Part 63 Subpart BBBBBB-Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline facilities.

Applicability: Federal air quality regulation applicable to all gasoline terminals, bulk gasoline plants, pipeline breakout stations in gasoline service and pipeline pumping stations in gasoline service that emits, or has the potential to emit less than 10 tpy of an individual HAP and less than 25 tpy of combined HAPs.

Who is subject to this Rule?

This rule applies to a bulk gasoline terminal that is an area source of Hazardous Air Pollutants (HAP's) as those pollutants are identified in the Clean Air Act, Section 112(b).

A bulk gasoline terminal is an area source if the entire facility has the potential to emit <10 tons per year (TPY) of a single HAP or <25 TPY of a combination of HAP's.

A bulk gasoline terminal that is subject to the control requirements of 40 CFR Part 63 Subpart R or Subpart CC is exempt from this rule. By submittal of this Notification of Compliance Status (NOCS), Sunoco Partners Marketing & Terminals L.P. is documenting that the referenced facility cannot make use of these exemptions, and is subject to the GDGACT rule.

Therefore, please find below the information mandated for inclusion in the NOCS pursuant to the GDGACT regulation.

I. Notifications/Submittals/Permitting:

1. Initial Notification for existing sources of applicability: Due by 05/09/08.
   [40 CFR 63.11093(a)]

2. Notification of Compliance Status: Due by 01/10/11.
   [40 CFR 63.11093(b)]

3. Permitting: Under 40 CFR part 70 (70.7 f 1i) and 71 (71.7 f 1i), permit re-openings are only required at major sources which have a remaining permit term of 3 or more years. So if the source is not part of a major source as defined by Title V, then the permit does not need to be reopened to incorporate the GACT requirements, rather the requirements of the GACT rule would be incorporated no later than when the permit is renewed.

4. Notification of Performance Test: Not applicable until the time that a new performance test is required. Additionally, results of any performance test will be submitted in a timely manner following completion of the test.
   [40 CFR 63.9(h)(2)(i)(B)]

5. Submittal for compliance with the recordkeeping requirements for tank tightness testing using the electronic alternative: This submission provides the written notification that this terminal is using the alternative method to meet compliance requirements specified in 40 CFR 63.11094(c)(2) Recordkeeping Requirements. As an alternative to keeping records at the terminal of each gasoline cargo tank test result, the documents are stored at an offsite location and copies will be made available via facsimile upon request.
[40 CFR 63.11094 (c)(ii)]

II. Gasoline Facility General HAP Summary:

1. The type and quantity of HAP's emitted by this source are less than 10 tpy of Individual HAP's, and less than 25 tpy for Total HAP's.
[40 CFR 63.9(h)(2)(D)]

2. The analysis demonstrating that the affected source is an 'Area Source' has been performed and documented in the application for the permit referenced below. Additional information can be provided upon request.
[40 CFR 63.9(h)(2)(E)]

Permit Number: 70235

III. Gasoline Load Rack Compliance Method:

1. This facility is operating its gasoline loading rack pursuant to one of the following INITIAL compliance options:

☐ *Conducting a performance test.* Conduct a performance test on the vapor processing and collection systems using test methods and procedures identified in §60.503 or using approved alternative test methods.
[40 CFR 63.11092(a)(1)]

☒ *Certification Statement.* There is an enforceable State, local or tribal rule or permit that requires the loading rack to meet an emission limit of 80 mg/L or less.
[40 CFR 63.11092(a)(2)]

State Rule: --
Tribal Rule: --
Permit Number: 70235

☐ *Previous performance test.* Submit past performance test results for the vapor processing and collection system if that test was performed between January 10, 2003 and January 10, 2008.
[40 CFR 63.11092(a)(3)]

☐ *Flares.* The performance test requirements of §63.11092(a) do not apply to flares as defined in §63.11100 and meeting the flare requirements in §63.11(b).
[40 CFR 63.11092(a)(4)]

2. This facility is operating its gasoline loading rack pursuant to one of the following ONGOING compliance options:

For **Vapor Recovery Units (VRU):**

☒ Hydrocarbon Continuous Emissions Monitoring System (CEMS) (see "Compliance Methodology for VRU's with CEMS" attachment for detailed monitoring procedures)See Note 3.
[40 CFR 63.11092(b)(1)(i)(A)]

☐ Alternative Monitoring (see "Compliance Methodology for VRU's without CEMS" attachment for detailed monitoring procedures).
[40 CFR 63.11092(b)(1)(i)(B)]

For **Vapor Combustion Units (VCU)** (other than a flare):

☐ CPMS capable of measuring temperature shall be installed in the firebox, or in the ductwork immediately downstream from the firebox, in a position before any substantial heat exchange occurs.
[40 CFR 63.11092(b)(1)(iii)(A)]

☑ Alternative Monitoring (see "Compliance Methodology for VCU's" attachment for detailed monitoring procedures).
[40 CFR 63.11092(b)(1)(iii)(B)]

For **Flares:**

☐ Heat-sensing device such as an ultraviolet beam sensor or thermocouple installed in proximity to the pilot light to indicate the presence of a flame.
[40 CFR 63.11092(b)(2)]

Notes:

1. In the event that a permanently stationed or portable backup unit is used to control load rack emissions, it will meet the 80 mg/L emission limit imposed by GD GACT. Reporting, monitoring, and recordkeeping requirements will be followed as detailed in the appropriate vapor control system 'Compliance Methodology' attachment.
2. All excess emission events will be documented in the next semi-annual compliance report pursuant to 40 CFR 63.11095(b).
3. There remains the option to use the alternative monitoring method as outlined in the attached methodology for 'VRU's with CEMS'.

IV. Gasoline Tank Compliance Method(s):

Tank number	Tank Type (IFR/EFR)*	Product	Capacity (gals)	11087(f) (NSPS Kb)	Table 1, Option 1 (Tanks < ~20,000 gallons)	Table 1, Option 2.b (GACT modified Kb - IFR)	Table 1, Option 2.c (GACT modified Kb – EFR)	Table 1, Option 2.d (MACT WW - IFR)	Table 1, Option 2.d (MACT WW -EFR)	To be determined at the next tank degassing or prior to 2018.
				NSPS Kb	Equip each gasoline storage tank with a fixed roof that is mounted to the storage tank in a stationary manner, and maintain all openings in a closed position at all times when not in use.	Equip each internal floating roof gasoline storage tank according to the requirements in 60.112b(a)(1) except for the secondary seal requirements under 60.112b(a)(1)(ii)(B) and the requirements in 60.112b(a)(1)(iv) through (ix).	Equip each external floating roof gasoline storage tank according to the requirements in 60.112b(a)(2) except for the requirements of 60.112b(a)(2)(ii) shall only be required if such storage tank does not currently meet the requirements of 60.112b(a)(2)(i).	Equip and operate each internal floating roof gasoline storage tank according to the applicable requirements in 63.1063(a)(1) and (b).	Equip and operate each external floating roof gasoline storage tank according to the applicable requirements in 63.1063(a)(1) and (b), and according to the applicable requirements in 63.1063(a)(2) if such storage tank does not currently meet the requirements of 63.1063(a)(1).	
1	IFR	Note 1	1,126,153							X
2	IFR	Note 1	2,272,158							X
3	IFR	Note 1	673,848							X
4	IFR	Note 1	1,945,588					X		
5	IFR	Note 1	821,226							X
6	IFR	Note 1	2,381,946	X						
7	IFR	Note 1	2,377,914	X						
21	IFR	Note 1	2,667,115	X						
22	IFR	Note 1	2,662,678	X						

* IFR = Internal Floating Roof Tanks (including Domed External Floating Roof Tanks, EFR = External Floating Roof Tanks.

Note 1: Floating roof storage tanks are equipped to handle Ethanol, Distillates, Transmix or Gasoline.

V. Gasoline Equipment Leak Inspection Compliance Method:

The facility will implement a monthly equipment leak inspection program that uses sight, sound, and smell observations of all gasoline equipment (including transmix equipment). Sight, sound, and smell sensory inspections are acceptable for fugitive leak point determinations pursuant to 40 CFR 63.11089(a).

Documentation (i.e. a 'log book') of all monthly equipment leak inspections will contain the following information:
[40 CFR 63.11089 and 40 CFR 63.11094(d) & (e)]

i. Record of the type of equipment; and
ii. List, summary description or diagram showing the location of all equipment in gasoline service; and
iii. Nature of the leak (e.g. liquid or vapor); and
iv. Method of leak detection (e.g. sight, sound, or smell); and
v. Date of detection; and
vi. Date of first attempt at repair (within 5-days of discovery); and
vii. Date of successful repair (within 15-days of discovery); and
viii. Reason for placing any equipment on the 'Delay of Repair' list (to be documented on the next semi-annual report); and
ix. Inspector signature.

NOTE: Monthly equipment leak inspections must be conducted no less than 28-days and no more than 35-days following the prior inspection.
[40 CFR 63.11100]

VI. Certification Section:

The Responsible Official and certification statements specified herein are intended to meet both state and federal requirements.

I, being the Responsible Official, hereby affirm that, based on information and belief formed after reasonable inquiry, the statements made in this Notification of Compliance Status are true, accurate and complete to the best of my knowledge.

David Justin
Print Name

Vice President - Operations
Title

Signature

1-7-2014
Date

COMPLIANCE METHODOLOGY

FOR VRU'S WITH CEMS

[40 CFR 63.11092(b)(1)(i)(A)]

Summary Statement: Monitoring of hydrocarbon emissions using a Continuous Emission Monitoring System (CEMS).

At the next performance test performed after January 10, 2011 a monitoring operating parameter value will be determined in accordance with 40 CFR 63.11092(b). Until such time as the next performance test after January 10, 2011, and in accordance with 40 CFR 63.11092(b)(4) and (5), the following provides the rationale for a selected operating parameter based on an engineering assessment, and is provided for the Administrator's approval:

On an ongoing basis, continued compliance of the gasoline truck loading VRU will be determined by a hydrocarbon continuous emission monitor (CEMS). To demonstrate compliance moving forward, the hourly average hydrocarbon outlet percent will be monitored to ensure it does not exceed an hourly average limit of 5.09 percent hydrocarbon.

Each truck contains approximately 9,000 gallons of vapor air which is passed through the carbon bed. At 30% Hydrocarbon (HC) concentration, this means about 850 ft^3 of air and 350 ft^3 of HC enter the carbon bed from each truck loaded. Since the units are 97%-99% efficient, most of the HC is absorbed by the carbon bed and essentially nearly pure air exits the bed. This means that for each 100 ft^3 of carbon bed, 850 ft^3 of air exit the beds each cycle when the unit is operating near design cycle.

For normal operation near design loading volumes and with 30% HC inlet vapor, 12 bed volumes of vapor enter and 8 ½ + 1 = 9 ½ bed volumes exit the bed for each cycle. This means that about 80% of the inlet volume amount (9 ½ /12 = .79) exits the bed as air. Or for every liter of inlet vapor, 0.8 liters of air exit the bed as a good average approximation for normal operation.

For each 1% of HC in the outlet measured as propane and with 0.8 liters of exit volume per liter inlet, the emissions are:

(0.8 L/1 L in) x(1gmole/22.4 L) x (1%/100%)x(44 grams/gmole C3)x(1000 mg/gram)=15.7 mg/L

(80 mg/L) / 15.7 mg/L = %C3
5.09 = %C3

Operating Parameter Value:
Not to exceed 5.09 % (Note, this value is based on an 80 mg/l emission rate.)

Monitoring Frequency:
Daily verification during manned hours: The CEMS will calculate every minute of an hourly rolling average (arithmetic mean of the 60 most recent 1-minute averaging values). The detector will measure the sample concentration at least once every 15 seconds. An average emission rate will be computed and recorded at least once every 60 seconds. The average hydrocarbon outlet percent will be monitored to ensure it does not exceed an hourly average limit of 5.09% for an 80 mg/l limit.

Averaging Time:
Hourly rolling average

Reporting requirement:
Semi-annual reporting of emissions and CEMS performance records must be submitted to the Administrator. If no excess emissions or parameter exceedances have occurred, such information shall be stated in the report. The semi-annual report should also indicate whether the CEMS has been inoperative, out of control, repaired or adjusted.

Note that in the event of CEM downtime during truck loading, if proper operation of the loading rack cannot be verified using the alternative method outlined in 40 CFR 63.11092(b)(1)(i)(B), a summary report may be submitted to the administrator, providing that:

-The total duration of excess emissions or parameter exceedances for the reporting period are less than 1 percent; and,

- The CEMS downtime is less than 5 percent (without alternative verification of proper operation).

If greater than 1 percent and 5 percent, both the summary and emissions/performance report shall be submitted.

COMPLIANCE METHODOLOGY

FOR VRU'S WITHOUT CEMS

40 CFR 63.11092(b)(1)(i)(B)

Summary Statement: Alternative monitoring of system operations for VRU's without CEMS.

The steps below constitute our alternative monitoring and inspection plan required by 40 CFR 63.11092(b)(1)(i)(B)(2)(i)-(v):

- The lowest maximum required vacuum level needed to assure regeneration of the carbon beds is 24 inches.
- The shortest duration needed to assure regeneration of the carbon beds at that vacuum level is 12 minutes.
    - Note that failure to reach the lowest maximum required vacuum level or the shortest duration for bed regeneration do not constitute a malfunction or excess emission event. The following approach will determine whether the VRU is operating outside of its acceptable monitored operating parameters:
        1. Lowest maximum required vacuum level is not met in any 1 carbon bed for 4 consecutive regeneration cycles; and/or
        2. The shortest duration needed to assure regeneration of the carbon beds at the lowest maximum required vacuum level was not met in any 1 carbon bed for 4 consecutive regeneration cycles; and
        3. The temperature in any 1 carbon bed exceeded 200F in any 1 regeneration cycle.

        NOTE: In the event that condition 1 and/or 2 above is met, and condition 3 is also met, this could constitute an excess emission event unless (1) a determination of the cause is begun within 1-hour of discovery, and (2) corrective actions to fix the problem are initiated within 24-hours of discovery.
        [40 CFR 63.11092(d)(4)]

- Daily verification of the system will occur using an automated alarm (7 days a week), and through a visual observation of the unit (on days when staffed) or through a remote system display (e.g. Human Machine Interface, etc.). These aspects of the system will be verified:
    - the proper valve sequencing, and
    - the cycle time, and
    - the gasoline flow; and
    - the purge air flow; and
    - the operating temperatures.

- Monthly Volatile Organic Compound (VOC) measurements of the carbon beds will occur using a portable analyzer and by implementing Method 21 (as an Open Ended Line). These measurements will be taken during the last 5-minutes of each bed's carbon adsorption cycle. The Lower Explosive Limit (LEL) of the reference gas will constitute the maximum allowable VOC concentration (e.g. 100% LEL as Pentane, etc.). Corrective actions will occur prior to reaching the LEL. Obtaining a measurement in excess of the LEL will not constitute a malfunction or excess emission. Rather, it will prompt immediate shutdown of the VRU and the load rack for further investigation.

- Semi-Annual preventative maintenance inspections will be conducted.

- Annual testing of system carbon will be conducted and results will be interpreted. Carbon will be replaced as necessary in consideration of the manufacturer's recommendation.

- Because the loading rack is equipped with an automatic shutdown mechanism that detects conditions trending towards a malfunction, the vapor control and processing system is designed to shutdown the load rack before any malfunction or excess emission events occur. However, if for some unforeseen reason there should be a malfunction and loading continues, the facility will comply with incident investigation procedures as detailed at 40 CFR 63.11092(d)(4) and deviation or excess emission reporting as required by 40 CFR 63.11095, as appropriate.
- Any system malfunction and any activation of the automated alarm system will be documented with a written entry into a log book or other permanent form of record.

COMPLIANCE METHODOLOGY

FOR VCU'S

[40 CFR 63.11092(b)(1)(iii)(B)]

Summary Statement: Alternative Monitoring of system operations for VCU's– verified daily via automated shutdown system or via visual inspection.

As an alternative to the CPMS for thermal oxidation units, the system will be equipped with an automated system to ensure compliance with 40 CFR 63.11092, or a visual inspection will be performed on days the equipment is operated.

The steps below constitute our alternative monitoring and inspection plan required by 40 CFR 63.11092(b)(1)(iii)(B)(2)(i)-(v):

- The current system design prevents loading without a pilot flame being present. Presence of a pilot flame will be verified through visual observation, automated alarm, or shutdown systems that monitor and record system operations.
- Daily verification of the system will occur using an automated alarm (7 days a week), and through a visual observation of the unit (on days when staffed) or through a remote system display (e.g. Human Machine Interface, etc.). These aspects of the system will be verified:
  - the proper operation of the assist-air blower, and
  - the vapor line valve, and
  - the automated shutdown system.
- Semi-Annual preventative maintenance inspections will be conducted.
- Because the loading rack is equipped with an automatic shutdown mechanism that detects conditions trending towards a malfunction, the vapor control and processing system is designed to shutdown the load rack before any malfunction or excess emission events occur. However, if for some unforeseen reason there should be a malfunction and loading continues, the facility will comply with incident investigation procedures as detailed at 40 CFR 63.11092(d)(4) and deviation or excess emission reporting as required by 40 CFR 63.11095, as appropriate.
- Any system malfunction and any activation of the automated alarm system will be documented with a written entry into a log book or other permanent form of record.